

ANCHORAGE WATER & WASTEWATER UTILITY



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Mayor*

General Manager's Office

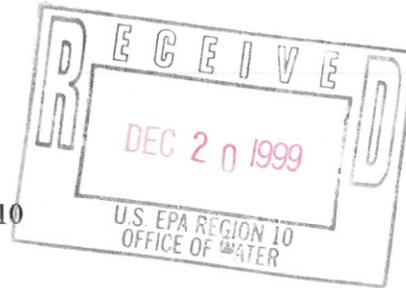
3000 Arctic Boulevard
Anchorage, Alaska 99503-3898
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Municipality of Anchorage*

December 15, 1999

Robert R. Robichaud
Manager, NPDES Permits Unit
United States Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, Washington 98101



Dear Mr. Robichaud:

Thank you for the opportunity to review the draft NPDES permit for the John M. Asplund Water Pollution Control Facility. We believe the draft permit contains reasonable effluent limits that are appropriate for the continued protection of the Cook Inlet environment.

Our comments focus on the technical details of the monitoring program. As part of your preparation of the final permit, we would be glad to discuss any question you or your staff might have on our comments.

Sincerely,


Mark Premo

Anchorage Water and Wastewater Utility Comments on Draft NPDES Permit for the John M. Asplund Water Pollution Control Facility

Note: The following comments are organized by numbered section of the draft NPDES permit.

I.B.3.

We suggest changing Temperature, pH, Dissolved Oxygen, BOD, Settleable Solids, TSS, and Fecal Coliform Bacteria sampling frequency to 2/week. This frequency is supported by methodology described in the Interim Guidance for Performance-Based Reduction of NPDES Permit Monitoring Frequencies – EPA 833-B-96-001. Previous monitoring has shown no benefit from more frequent sampling of these parameters. Also, a reduced and consistent sampling frequency among these parameters reduces monitoring time and expense without sacrificing treatment plant performance information.

It is assumed that Heavy Metals, Cyanide, and other Toxic Pollutants and Pesticides will each be sampled twice per year as part of the Table 2 requirements. Since Heavy Metals and Cyanide are included in the parameter category of Toxic Pollutants and Pesticides there is therefore no need to list Heavy Metals and Cyanide separately. We suggest removing the separate listing of Heavy Metals and Cyanide.

We suggest changing the specification for metals reporting from “total” and “dissolved” to “total” for sludge (i.e. remove requirement for dissolved testing on sludge) and “total”, “total recoverable”, and “dissolved” for influent and effluent (i.e. add requirement for total recoverable testing on influent and effluent). Water quality criteria are developed in terms of total recoverable and dissolved metals concentrations. In order for this monitoring to be useful for analysis of compliance with water quality criteria, the total recoverable metals concentration needs to be measured and reported.

I.B.4.a.

In order to make receiving water quality monitoring consistent with monitoring that has been conducted in the past, the station location specification for Total Aqueous Hydrocarbons, Total Aromatic Hydrocarbons, and Heavy Metals and Cyanide should be changed. We suggest specifying that sampling for these three parameters be done on the first flood tide cruise at both the outfall and control location. Samples would be collected within the ZID, at the ZID boundary, and in the near field.

We suggest changing the specification for metals reporting in Table 3 from “total” and “dissolved” to “total recoverable” and “dissolved”. The receiving water monitoring would then be consistent with the receiving water quality criteria for metals.

II.B.7.c.

It is assumed that the first day of sampling specified in Table 5 would be accomplished by the Influent, Effluent, and Sludge monitoring for Toxic Pollutants and Pesticides specified in Table 3. We suggest adding a footnote to Table 5 that makes this clear. The footnote could read, “The first day of the 3 consecutive days of sampling specified by this table are accomplished by the twice per year sampling for the same constituents specified in Table 2.

I.C.5.d.

We suggest changing the specification for control and dilution water from “synthetic, moderately hard laboratory water” to “natural or synthetic seawater”. Seawater is the appropriate medium for the marine organisms on which the bioassay tests will be conducted.

I.C.7.b

We suggest changing the specification for conducting “six more tests, bi-weekly (every two weeks), over a twelve week period” to “three more tests, bi-weekly (every two weeks), over a six week period.” This change is consistent with the Anchorage Eagle River NPDES Permit.

I.C.8.a.

Some additional flexibility should be incorporated into the process of moving from detection of chronic toxicity to a full blown TRE/TIE. The TRE/TIE studies can be very expensive and consideration should be given to all available information before their initiation. We suggest making the following changes to this section:

“If chronic toxicity as defined in Part I.C.4. is detected in any of the three additional tests required under Part I.C.7.b., then the discharger shall notify the Director of the Office of Water. If the Director determines that the discharger consistently exceeds a toxicity effluent limitation, then, in accordance...”

This wording change is consistent with the City of San Diego’s Point Loma 301(h) NPDES Permit.

Mike



Resource Development Council for Alaska, Inc.

121 West Fireweed Lane, Suite 250, Anchorage, Alaska 99503-2035
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NUMBER OF PAGES INCLUDING COVER SHEET 3

DATE: 12/16 1999 TIME: 3:30 AM (PM)

TO: Robert Robichaud

COMPANY: U.S. EPA - NPDES Permits

206 553-0165

FAX: _____ PHONE: _____

FROM: Ken Freeman Portman Dougherty Owens

RE: _____

MESSAGE: _____

Please call (907) 276-0700 if all pages not received.



Resource Development Council for Alaska, Inc.

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December 16, 1999

Robert R. Robiehaud
Manager, NPDES Permits Unit
United States Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

RE: NPDES permit for Point Woronzof

Dear Mr. Robiehaud:

On behalf of the Resource Development Council for Alaska, Inc. (RDC), I am writing to urge EPA to grant the Municipality of Anchorage (MOA) a renewal of its NPDES permit for the Point Woronzof Water Pollution Control Facility.

RDC is a statewide, membership-funded, non-profit trade association. Our membership includes individuals and leading companies from all of Alaska's basic industrial sectors; mining, timber, tourism, fisheries and oil and gas. Also included in our ranks are support industry companies, organized labor, Native corporations and local communities.

RDC's mission is to grow Alaska's economy through the responsible development of our natural resources. RDC works at the federal, state and local levels in both the legislative and regulatory arenas to accomplish this goal.

We support EPA's tentative decision to grant the MOA a renewal of its NPDES permit for the Point Woronzof facility. The discharge limits contained in the draft permit will continue to ensure protection of the Cook Inlet environment and its use by humans, fish and wildlife. In fact, there is a substantial body of evidence to support this conclusion.

MOA's NPDES permit application contains a thorough review of available scientific information on the physics, chemistry and biology of the Knik Arm of Cook Inlet in addition to new studies and analyses. The independent evaluations conducted by the staff of EPA and other state and federal agencies support the information provided by the MOA. Finally, extensive monitoring conducted in the Inlet since 1986 supports the finding that there will be no adverse impacts from the point Woronzof discharge.

In addition to making good scientific sense, the proposed NPDES permit makes good economic sense. By not requiring unnecessary treatment, cost savings are realized by the citizens and businesses of Anchorage. In turn, these cost savings will contribute to the prosperity of all the people of the State of Alaska.

Sincerely,

RESOURCE DEVELOPMENT COUNCIL,
For Alaska Inc.

A handwritten signature in black ink, appearing to read "Ken Freeman", with a long horizontal flourish extending to the right.

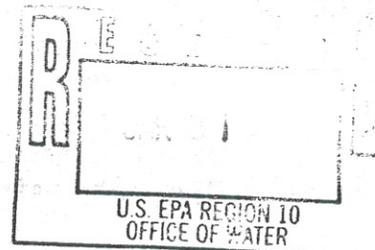
Ken Freeman
Executive Director



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service

222 W. 7th Avenue, #43
Anchorage, Alaska 99513-7577

January 7, 2000



Robert Robichaud
Manager, NPDES Permit Unit
Environmental Protection Agency
Region 10
1200 Sixth Avenue
Seattle, Washington 98101

Re: Draft NPDES AK-002255-1
John M. Asplund Facility

Attn: Mr. Mike Lidgard

Dear Mr. Robichaud:

The National Marine Fisheries Service has reviewed the above referenced draft National Pollutant Discharge Elimination System (NPDES) permit (draft) for the John M. Asplund Water Pollution Facility. While the draft and Fact Sheets provide NMFS with information to formulate an initial response, there are several unanswered questions and statements needing further explanation. Therefore, we provide the following comment for your review.

We agree with the EPA decision to require the operator to conduct WET testing on a vertebrate species and two invertebrate species, the top smelt (*Atherinops affinis*) and pacific oyster (*Crassostrea gigas*), mussel (*Mytilis spp.*), and purple urchin (*Strongylocentrotus purpuratus*) or sand dollar (*Dendraster excentricus*), respectively (Fact Sheet, page 32). However, we feel the top smelt may not represent the native species found in Cook Inlet. Top smelt are not found in Alaskan waters and are more associated with warmer ocean conditions, rocky areas and kelp forests. Cook Inlet lacks these water and substrate habitats. A different and anadromous species of smelt, eulachon (*Thaleichthys pacificus*), is readily abundant in Cook Inlet during April and May and may be a more suitable test species. Therefore, we suggest the EPA investigate the ability to WET test eulachon in similar ocean conditions, salinity and temperature, found in Cook Inlet.

NMFS is unclear with your conclusions: "EPA is evaluating potential impacts to beluga whales from this permit" and "the



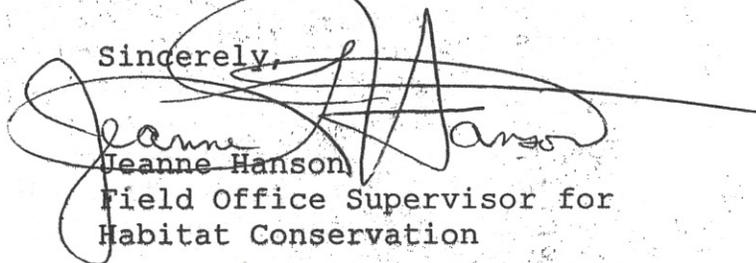
EPA has determined that the discharge will not adversely impact beluga whales" (Fact Sheet, page 40). This leads NMFS to speculate you may or may not be able to determine if there has been, currently is, or will be adverse impacts to beluga whale populations of Cook Inlet. Therefore, we ask the EPA to provide NMFS with their findings for review and suggest the EPA determine the affect.

The Fact Sheet (page 41) specifically states the "EPA is currently developing an EFH assessment for this permit action along with site specific water quality criteria revisions for this portion of Cook Inlet... When complete, EPA will provide the EFH Assessment to NMFS for review." The NMFS will wait until such an assessment is complete to offer EFH conservation recommendations, if any, during that review. The EFH Assessment may be in a separate document or in the final permit. However, the EFH assessment will need to address the mandatory EFH requirements as described in 50 CFR 600.920 (g): (i) a description of the proposed action, (ii) an analysis of the effects on EFH, (iii) the agencies views regarding the effects of the action on EFH, and (iv) proposed mitigation. These contents are likely included in some form of an assessment already. However, a clearly referenced EFH assessment will satisfy the requirements of the provisions regarding EFH within the administration of the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA) (16 U.S.C. 1801 et seq.).

Additionally, NMFS asks the EPA to provide supplementary information and forecast what effects would exist should the facility be upgraded to include secondary treatment. We feel this information would enable us to understand what long term effects may exist should the facility remain unchanged. Also, this information would better our understanding of secondary treatment facilities not normally reviewed by our staff.

We thank you for this opportunity to comment.

Sincerely,



Jeanne Hanson
Field Office Supervisor for
Habitat Conservation

NMFS Contact Person: Matthew P. Eagleton

cc: ADEC, ADGC, ADFG, USFWS, EPA - Anchorage